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From: Halsey, Ronald H
Sent: Sun 2/5/2017 6:37:43 PM
Subject: EPA Oversight at Leviathan
Copy of 170124 DocMtg Summary 2015-2017.xlsx

Caleb,

During our call before the January 17th management meeting for Leviathan and during the January 17th meeting, I mentioned that AR feels like Leviathan is being managed like a Fund lead site vs. a PRP lead site. I wanted to provide a little more context to that statement. What I meant was the level of oversight often seems to be more like what might be expected if EPA was performing the RI/FS itself using its own contractor(s), rather than acting in a review-and-approval capacity. Attached is AR's RI/FS document tracking spreadsheet that is maintained by AR's consultant AMEC Foster Wheeler (AMECFW). I've filtered the spreadsheet to show only 2015-2017 deliverables to EPA. You can remove the filter to show previous year's documents as well. As you can see, the quantity of submittals has been extensive (especially in 2016), and it far exceeds the reporting requirements in the UAO and the list of major submittals set forth in Attachment 2 to the Statement of Work. We believe often times there are excessive back and forth communications with comments, revisions, and more comments and ultimately ending only in contingent approval.

I bring this to your attention because it is the same technical team that prepares all of these documents that is also working on the Site Characterization Report, preliminary health risk screening documents and preliminary feasibility study documents. AMECFW has over 40 full time people working on the various technical documents we are preparing for this site. At times, the that number has been substantially higher. The level of EPA oversight for Leviathan is unparalleled to any other AR mining site I have been involved with, and moreover, any CERCLA site our numerous experts have worked on. I'm hopeful that our pending agreement on schedule and interim deliverables will significantly reduce this document list and multiple revisions going forward. If not, the ability to meet our pending schedule could be jeopardized.

Feel free to call me if you would like to discuss further. Thank you.

Ron Halsey

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